

Before the
Federal Communications Commission

In the Matter of)	
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Restoring Internet Freedom)	WC Docket No. 17-108
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Kip
(Interface Foundry PBC)

June 22, 2017

Alyx Baldwin
CTO, Co-Founder
KIP (INTERFACE FOUNDRY PBC)
122 w 27th St
10th Floor
New York, NY 10001

Executive Summary

- Kip is an Artificial Intelligence (AI) agent that helps social shoppers streamline the group ordering process via chat apps, and split payments to save money on goods unavailable in their countries.
- Kip's main office is at 122 w 27th St. 10th floor, New York, NY 10001
- We have 8 full-time employees in New York City
- Kip has 1.5 million Monthly Active Users
- Kip generates \$450k in Monthly Transaction Volume

We support a truly open Internet, and we rely on it for our business. The FCC's proposal would allow the creation of a two-tiered Internet, stifling our ability to compete with big, established incumbents. Allowing big cable and wireless companies to pick winners and losers in the market will not only harm our business, but the ability of any new entrants to enter the market to compete fairly with incumbents (including the cable and wireless companies themselves).

We urge the FCC to sustain the existing, strong net neutrality rules, based on Title II of the Communications Act. The FCC should maintain bright line rules against blocking, throttling, and paid prioritization on both fixed and mobile connections, as well as maintain ongoing oversight of other types of discrimination.

I. Who We Are and What We Do

The co-founders of Kip, Rachel Law and Alyx Baldwin, attribute their success entirely to the open Internet.

Before Kip, Rachel ran an online shopping community for teenage girls with global sales. She coordinated logistics with others entirely online. Alyx taught herself programming, design and machine learning from online forums and open access to scientific research, leading to important employment milestones on her career path.

The open Internet is essential to moving our company forward in innovative ways as we continue to innovate in the e-commerce and artificial intelligence space. We must retain a

competitive advantage and acquire global customers in a way only an open Internet can provide, else we will lose on the international stage.

II. The FCC Should Sustain Its Existing Strong Net Neutrality Rules and The Existing Legal Framework Under Title II

As the creator of online applications, we depend on an open Internet. We would not have existed without it, and, right now, we can compete and reach a worldwide audience, and succeed based on the quality of our application; big companies may have bigger marketing budgets than us, but ultimately any consumer can choose to use our app with the same broadband speeds they'd get for any other service. The FCC's proposal would open the door to a two-tiered Internet, however, where big companies' traffic would be put in a fast lane, while we're relegated to a slow lane.

The proposed approach under Title I would interfere with innovation, competition, and consumer choice online. Previous court rulings have said that an approach under Title I would preclude certain bright-line rules. Instead, the FCC is proposing a set of vague legal standards that would allow discrimination. Small companies like ours do not have the legal resources to address instances of discrimination, absent the existing bright line rules and authority for ongoing oversight. By the time the lengthy process of case-by-case review of anti-competitive behavior is complete, a startup like ours would simply not exist.

The FCC's existing framework works well. It should sustain its current approach under Title II; ban blocking, throttling, or paid prioritization of Internet traffic; and continue ongoing oversight of other discriminatory conduct.

Respectfully submitted,

Alyx Baldwin
CTO, Co-Founder
Kip (Interface Foundry PBC)